Osborne v. *Grand T. Ry. Co.,* 87 Vt. 104, 88 Atl. 512, Ann. Cas. 1916C 74. Some cases hold that if the party who made the entry cannot be compelled to appear, his testimony may be dispensed with. *Vinol* v. *Gilman,* 21 W. Va. 321, 45 Am. Rep. 562. Many courts still apply strictly the rule requiring authentication. *Randall* v. *Borden,* (Tex. Civil App.), 164 S. W. 1063; *Little Rock Granite Co.* v. *Dallas County,* 66 Fed. 522, C. C. A. 620

EVIDENCE—VALUE OF SERVICES MEASURED BY UNION SCALE.—Plaintiff sued on a mechanic's lien to recover for labor and materials used in doing plumbing for defendant. Evidence was admitted showing the union rate of wages for journeymen plumbers. Defendant objected because it had not been shown that the contract was based upon union prices. *Held,* that the trial court properly admitted the evidence. *Schalich* v. *Bell,* (Cal. 1916), 161 Pac. 983.

In determining the value of services courts have quite generally excluded evidence tending to show rewards for similar services in analogous cases, because it raises too many collateral issues; yet it would seem that such a method of showing the proper amount of recovery would be most accurate. *Harris* v. *Russell,* 93 Ala. 59, 9 So. 541; *McKnight* v. *Detroit & M. Ry. Co.,* 135 Mich. 307, 97 N. W. 772. In *Seurer* v. *Horst,* 31 Minn. 479, 18 N. W. 283, proof of wages received by another employee of defendant was excluded as not being evidence of the value of plaintiff's services. To the same effect is *Forey* v. *Western Stage Co.,* 19 Ia. 535. To show the reasonableness of fees charged for services of a physician or an attorney, evidence is usually rejected as to fees charged in previous similar cases. *Collins* v. *Fowler,* 4 Ala. 647; *Robbins* v. *Harvey,* 5 Conn. 335. Some courts allow value received for similar services to be shown, but in such cases it is always difficult to show sufficient similarity. *Maurice* v. *Hunt,* 80 Ark. 476, 97 S. W. 664; *Peters* v. *Davenport,* 104 Ia. 625, 74 N. W. 6; *Krammen* v. *Meridean M. Co.,* 58 Wis. 399, 17 N. W. 22. The practical difficulty of establishing the value of personal services is well illustrated in a New York case where the plaintiff had personally cared for a very corpulent man, kept his house, and done his sewing. Plaintiff's witness was allowed to show what she was accustomed to pay for such services under similar circumstances. The court recognized the difficulty of the situation and remarked, "In this we see no error. It was, as we have said, the best that the situation permitted the plaintiff to do." *Edgecombe v. Buckhout,* 146 N. Y. 332, 40 N. E. 991, 28 L. R. A. 816. In view of the present difficulty of determining the value of services of the various trades, it would seem that the union scale of wages would be a dependable and fair basis. Incidentally, the court's recognition of union wages as a fair scale offers a bit of encouragement to labor organizations.

INJUNCTION—TO PREVENT SOLICITATION OF CUSTOMERS BY FORMER EMPLOYEE.—For a number of years the defendant was a driver and solicitor for the plaintiff laundry company. He left the employ of the latter suddenly and began soliciting the plaintiff's customers for a rival laundry. Few, if any, of the customers knew of the defendant's change of employment.